

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Mariah Lopez

Write the full name of each plaintiff or petitioner.

Case No.

17 CV 3014

NYC DHS et al

against-

NOTICE OF MOTION For
CLASS Certification

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Write the full name of each defendant or respondent.

PLEASE TAKE NOTICE that

Plaintiff

plaintiff or defendant

Mariah Lopez

name of party who is making the motion

requests that the Court:

Entertain of motion for Plaintiff and at least
Four other TLBBG ("Queen") individuals seeking Class Action
Certification under Federal Law. All individuals have real
injuries and claims against the NYC Dept. of Homeless Services,
relating to NYC DHS neglect and abuse of these and other Queen
Individuals

Briefly describe what you want the court to do. You should also include the Federal Rule(s) of Civil Procedure or the statute under which you are making the motion, if you know.

In support of this motion, I submit the following documents (check all that apply):

- ☐ a memorandum of law
☐ my own declaration, affirmation, or affidavit
☐ the following additional documents:

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 5-21-19

Dated

Mariah Lopez

Signature

Name

Home Less

Prison Identification # (if incarcerated)

NY

Address

212 470 9687

City

State

Zip Code

Telephone Number (if available)

E-mail Address (if available)

mariah4change@gmail.com

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Fill in above the full name of each plaintiff or petitioner.

Mariah Lopez

Case No. 17 CV 3014

-against-

NYC DHS et al

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Fill in above the full name of each defendant or respondent.

DECLARATION

Briefly explain above the purpose of the declaration, for example, "in Opposition to Defendant's Motion for Summary Judgment."

I, Mariah Lopez, declare under penalty of perjury that the following facts are true and correct:

In the space below, describe any facts that are relevant to the motion or that respond to a court order. You may also refer to and attach any relevant documents.

Since this case has ~~been~~ started, it has become clear that multiple TLGBQ individuals (especially those whose Gender or Gender Expression are different than that assigned at birth) have valid

1: claims of neglect and abuse ^{ML}
 This abuse and neglect is widespread and systemic. Despite being prose, it is my belief that Plaintiff and other TLGBQ individuals known to NYC DHS and the Law Dept, make up the definition of a "Class" under the Federal rules of Civil Procedure; myself, Akasha Banker, Jamel Young and two other TLGBQ individuals satisfy ALL prerequisites outlined ^{ML} under Rule 23A, Sections 1-4

No case law exists that would preclude non-lawyers from seeking "Class" Certification. Numbers 3 and 4 of 23A are most important, since the Class Certification would benefit all TLGBQ individuals ~~in~~ ^{ML} who are facing homelessness in NYC, and the variation in gender expressions and medical needs between proposed-class-plaintiffs that such a case would represent the needs of most Queen Folk.

Attach additional pages and documents if necessary. →

Executed on (date)

Signature

Name

Prison Identification # (if incarcerated)

Address

City

State

Zip Code

Telephone Number (if available)

E-mail Address (if available)

Because the facts support satisfaction of Section 23A 1-4, Section 23 G 1 is triggered and, the Court must disregard plaintiffs pro se status, and appoint Class Counsel, making any legal issue of a "Class of pro se litigants" ~~non-existent~~ ^{ML} non-existent.

Attach additional pages and documents if necessary.

5/21/19

Executed on (date)

Mariah Lopez

Name

Homeless

Address

212 470 9687

Telephone Number (if available)

Signature

Prison Identification # (if incarcerated)

City

State

Zip Code

E-mail Address (if available)

mariah4Cheryl@gmail.com